

CODE OF CONDUCT

Version	Date	Evolution	Author
A	19/10/2023	Original document	LVDS
B	29 jul 2026	Update	KVD
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1. General

1.1. Language

The original version of this document is made in Dutch, in compliance with local regulations. This translation in English is provided for the convenience of international communication.

1.2. Document control

Field	Reference
Policy owner	Compliance Manager
Executive sponsor	Managing Director
Approved by	Management Team
Effective date	29 jul 2026
Review cycle	Annually, and following material legal, business, or risk changes
Applies to	Nucomat bv, directors, employees, temporary and agency workers, interns, and contractors when acting for Nucomat
Related documents	Sustainability Policy; Supplier Code; HSE procedures; Privacy Policy; Speak-up Procedure; Work regulations.

1.3. Summary

We act lawfully, honestly, safely, respectfully, and transparently. When unsure, stop, seek advice, and raise the issue before acting.

1.4. Purpose and scope

This Code defines the minimum standards expected when working for or representing Nucomat. It applies at Nucomat sites, customer and supplier sites, during travel and remote work, at work-related events, and in business communications. Managers must lead by example and ensure that commercial pressure never overrides this Code.

Local law may impose stricter rules. Those rules prevail. Suspected conflicts between this Code and local law must be escalated to the Compliance Officer or Managing Director.

2. Code of conduct

2.1. Our decision test

- Is it legal and consistent with this Code and Nucomat policy?
- Is it safe, fair, and respectful to affected people and the environment?
- Could I explain the decision honestly to a colleague, customer, regulator, or family member?
- Is the decision properly authorised, documented, and free from personal conflict?
- If still uncertain, have I asked for advice before proceeding?

2.2. Respectful workplace and human rights

- Treat everyone with dignity. Discrimination, harassment, bullying, violence, threats, humiliation, and retaliation are prohibited.
- Base employment decisions on legitimate job-related criteria and provide reasonable accommodation where required.
- Prohibit forced labor, trafficking, worker-paid recruitment fees, deposits, coercion, deceptive recruitment, passport retention, and unlawful child labor.
- Respect lawful freedom of association, worker representation, collective bargaining, wages, benefits, working time, rest, and leave.
- Raise concerns about adverse impacts on workers, communities, customers, or others. Nucomat will act or cooperate in remediation where appropriate.

2.3. Health, safety, security, and the environment

- Follow risk assessments, safe-work instructions, permit requirements, training, access controls, and emergency procedures.
- Use required personal protective equipment and only operate equipment for which you are trained and authorised.
- Report hazards, near misses, injuries, illnesses, spills, releases, security events, and unsafe equipment immediately. Stop work where there is a serious and imminent danger, consistent with applicable law.
- Protect product safety and quality; never bypass safeguards, inspections, test results, or required documentation.
- Use energy, water, materials, chemicals, transport, and waste services responsibly. Environmental claims must be specific, evidence-based, and approved.

2.4. Anti-bribery and improper advantages

Never offer, promise, give, request, authorise, or accept a bribe, kickback, facilitation payment, secret commission, or anything of value intended to obtain an improper advantage. This includes conduct through agents, distributors, suppliers, consultants, or other intermediaries.

Situation	Rule
Gifts and hospitality	Must be lawful, infrequent, modest, transparent, business-related, accurately recorded, and incapable of influencing a decision. Cash and cash equivalents are prohibited.

Situation	Rule
Public officials	Obtain advance written approval from the Managing Director for any gift, hospitality, travel, donation, or other benefit involving a public official.
Donations and sponsorships	Must not be used to disguise a payment or obtain business improperly; require documented due diligence and approval.
Commissions and discounts	Must correspond to legitimate services or commercial terms, be proportionate, contractually documented, and paid through traceable channels.

2.5. Conflicts of interest

Avoid situations where personal interests could influence, or appear to influence, Nucomat decisions. Promptly disclose actual, potential, or perceived conflicts to the Compliance Officer. Do not participate in the relevant decision until the conflict has been assessed and safeguards are documented.

- A financial or family interest in a customer, supplier, competitor, or candidate.
- Outside employment, directorships, consulting, or business activity that competes with or affects Nucomat.
- Selecting, supervising, or approving payments involving a relative, close personal relationship, or personal business.
- Using Nucomat information, opportunities, assets, time, or influence for personal benefit.

2.6. Fair competition and business relationships

- Do not agree with competitors on prices, margins, bids, customers, territories, output, wages, or other competitive terms.
- Do not exchange non-public competitively sensitive information without a lawful, approved purpose and safeguards.
- Never manipulate tenders, submit sham bids, make false statements about competitors, or seek confidential information improperly.
- Select business partners objectively on documented capability, quality, safety, sustainability, service, integrity, and total value.

2.7. Trade compliance and responsible sourcing

Comply with applicable customs, sanctions, export controls, anti-boycott rules, product-origin requirements, and forced-labor import restrictions. Do not proceed where required screening, classification, licensing, end-use/end-user checks, or origin evidence is incomplete.

2.8. Accurate records, assets, and fraud prevention

- Create complete, accurate, timely records of transactions, expenses, time, testing, quality, inventory, and approvals.
- Never falsify, conceal, backdate, destroy, or misclassify records, and never maintain undisclosed accounts or side agreements.
- Protect Nucomat money, tools, devices, vehicles, materials, credentials, intellectual property, and opportunities from misuse, loss, theft, or fraud.

- Follow retention and legal-hold instructions; cooperate honestly with audits, investigations, and authorities.

2.9. Privacy, confidentiality, and cybersecurity

- Access personal, confidential, customer, or supplier information only when required for authorised duties.
- Use approved systems, strong authentication, secure sharing methods, and clean-desk/clear-screen practices.
- Do not send confidential data to personal accounts or unapproved cloud, AI, messaging, or storage services.
- Report phishing, misdirected emails, lost devices, unauthorised access, malware, and suspected data breaches immediately.
- Continue protecting confidential information after employment or engagement ends.

2.10. External communications and political activity

Only authorised persons may speak for Nucomat, commit the company, publish sustainability claims, engage the media, or communicate with regulators on Nucomat's behalf. Personal political activity must be lawful, voluntary, outside working duties, and must not imply Nucomat support or use company resources without approval.

2.11. Speak up and non-retaliation

Ask a manager, the Compliance Officer, the Managing Director, or the Complaints Officer for advice. Concerns may be reported under the Speak-up Procedure, including confidentially. Until a dedicated channel is activated, a sealed letter marked "Strictly confidential - Speak-up" may be sent to Nucomat bv, Spieveldstraat 65, B-9160 Lokeren, Belgium. Emergency, safety, and criminal matters may also be reported directly to the competent authorities.

Nucomat prohibits retaliation against anyone who raises a concern in good faith, refuses misconduct, requests advice, or assists an investigation. Deliberately false allegations may result in action; a good-faith report is protected even if not substantiated.

2.12. Accountability

Breaches may lead to coaching, corrective action, removal of authority, disciplinary action up to termination, contractual remedies, recovery of losses, or referral to authorities. Decisions will be proportionate, consistent, and compliant with applicable law. Managers must not direct or tolerate conduct they could not perform themselves.

3. Acknowledgement

I confirm that I have received, read, and understood the Nucomat Code of Conduct; I will comply with it, complete assigned training, disclose conflicts, seek advice when uncertain, and report suspected misconduct.

Name	Role	Signature	Date